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Sam's West d/b/a Sam's Club

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

STANISLAWA WALKER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
SAM'S WEST d/b/a SAM'S CLUB,	)	
	)	Case No. 3:13-cv-_____ - ____
Defendants.	)	
	)	

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**NOTICE OF REMOVAL**

TO: The United States District Court  
For the District of Alaska

AND TO: Charles W. Coe  
810 W. 2<sup>nd</sup> Avenue  
Anchorage, AK 99501

You are hereby notified that, pursuant to 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446, the above defendant, SAM'S WEST d/b/a SAM'S CLUB has this day filed in the United States District Court for the District of Alaska this Notice of Removal of the following action: Stanislawa Walker v. Sam's West d/b/a Sam's Club, filed in the Superior Court for the State of Alaska, Third Judicial District at Anchorage, Case No. 3AN-13-07397

CI. You are also notified that the said defendant has filed a copy of this Notice with the Clerk of the Superior Court for the Third Judicial District at Anchorage, and that said action has thereby been removed from the Superior Court to the United States District Court. *See*, Ex. A (“Notice of Removal to United States District Court” without attachments).

The grounds for removal are as follows: Complete diversity of citizenship. 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446. Plaintiff is a resident and citizen of the State of Alaska (Ex. B, Complaint at ¶ 1). Defendant, Sam’s Club is a Delaware corporation whose principal place of business is in Arkansas, and is therefore a citizen of Delaware and Arkansas, and there is complete diversity of citizenship amongst the parties. Suit was filed by plaintiff in Alaska Superior Court, Third Judicial District at Anchorage, on or about May 23, 2013. Plaintiff’s complaint alleges a claim for damages in excess of \$75,000.

This removal is being filed within thirty (30) days after the receipt of the complaint and summons.

Based on the above, this court has removal jurisdiction over this action, and defendant Sam’s Club is entitled to remove this action to this Court from the Superior Court for the State of Alaska.

DATED this 3rd day of July, 2013, at Anchorage, Alaska.

RICHMOND & QUINN  
By: /s/ Kenneth M. Gutsch, , ABA 8811186  
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Attorneys for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy  
of the foregoing was served electronically this 3rd  
day of July, 2013 on:

Charles W. Coe  
[charlielaw@gci.net](mailto:charlielaw@gci.net)

/s/ Kenneth M. Gutsch  
RICHMOND & QUINN  
2245\055\PLD\Removal from State Court

NOTICE OF REMOVAL

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